

EXHIBIT 1

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION**

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| ETHAN RYDER et al., <i>on behalf of themselves and all others</i> <i>similarly situated,</i> Plaintiffs, v. WELLS FARGO BANK, N.A. Defendant. | Case No.1:19-CV-638 Judge Timothy S. Black Magistrate Judge Karen L. Litkovitz |
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**DECLARATION OF MARC DANN IN SUPPORT OF FINAL APPROVAL OF CLASS
ACTION SETTLEMENT AND ATTORNEYS' FEES, LITIGATION EXPENSES, AND
CLASS REPRESENTATIVE SERVICE AWARDS**

I, Marc Dann, declare under penalty of perjury as follows:

1. I am the principal of DannLaw. I am also a Partner of Advocate Attorneys LLP in Washington DC. These practices focus on representing clients who have been harmed by mortgage loan servicers, governments, banks, debt buyers, debt collectors and other financial predators and providing access legal services for traditionally underserved working class and middle class Americans. I have fought for the rights of tens of thousands of consumers and brought thousands of individual and class actions lawsuits on behalf of clients in both private practice and as Ohio's Attorney General.

2. My firm and I have acted as Class Counsel in this matter from August 2, 2019 to the present. Accordingly, I am very familiar with the nuances of this case including the prolonged settlement discussions that resulted in this substantial Settlement. The Settlement was

reached only after several amended complaints were filed and briefing on a motion to dismiss was complete.

THE CLAIMS

3. The operative complaint, the Third Amended Class Action Complaint (Doc. 42) alleged several claims including (1) breach of contract; (2) breach of the form contracts implied covenant of good faith and fair dealing; (3) fraudulent concealment; (4) intentional infliction of emotional distress; and (5) gross negligence and/or negligence. These claims were alleged on behalf of a Class of Wells Fargo mortgagors whom Plaintiffs assert were erroneously denied trial loan modifications by Wells Fargo because of a software error.

4. Plaintiffs faced real legal risks through the continued prosecution of this case (*i.e.* statute of limitations, proving damages, gaining class certification, potential appeals of decision favorable to Plaintiffs, etc.). Furthermore, this Action presented a number of complicated legal and factual issues concerning: (1) various claims from plaintiffs from different states; (2) Wells Fargo's previous remediation to Class Members for the trial loan modification calculation error that is the subject of this Action; (3) Wells Fargo's identification of more than 1,000 class members who were identified after the first mediation in this case; and (4) Wells Fargo's aggressive opposition to this and other cases involving class members.

THE SETTLEMENT

5. Under the guidance of former federal judge, U.S. Magistrate Judge Morton Denlow (Ret.), a well-respected and neutral JAMS mediator, we were able to forge a settlement in principle with Wells Fargo to fully resolve this matter. Notably, the two mediation sessions

with Judge Denlow each lasted a full day and were conducted several months apart. The Settlement finally resolved several lawsuits in multiple jurisdictions.

6. The arm's length Settlement reached in this case was hard fought resulting in substantial Settlement benefits to the Class including over \$9,098,907.00 in direct payments to the Class Members, and the payment of attorneys' fees (\$2,719,093.00) and litigation expenses (up to \$65,000.00), Class Representative Incentive Awards totaling \$17,000.00 and up to \$100,000.00 to JND for settlement administration. These payments to the Class Representatives, to Class Counsel for attorneys' fees and expenses, and to JND are separate from and above the over \$9,098,907.00 that is being paid directly to Class Members. Besides the Settlement Agreement, the Parties have not entered into any other agreements relating to the settlement of this case. Thus, the requested attorneys' fee award will not in any way change or reduce the amount of payments made available to Class Members.

7. The Class Representatives in this matter have common interests with the Class Members because they all suffered economic damage resulting from not being offered a trial loan modification by Wells Fargo.

CLASS COUNSEL AND THE CLASS REPRESENTATIVES' EFFORTS

8. Class Counsel, consisting mainly of myself Brian Flick, Dan Solar and Javier Merino from my firm, Terence R. Coates from Markovits, Stock & DeMarco, LLC, Michael Schrag from Gibbs Law, Rick Paul and Laura Fellows from Paul LLP, and Gretchen Cappio and Alison Chase from Keller Rohrback, LLP, have expended substantial effort representing Plaintiffs and the Class, including drafting multiple detailed complaints; briefing motions to dismiss; successfully litigating two related discovery only actions; analyzing the strengths and

weaknesses of the case; responding to a motion to stay proceedings pending a decision from the Judicial Panel on Multidistrict Litigation; participating in two day-long mediation sessions with Judge Denlow; drafting and negotiating the Settlement Agreement; and working with the Plaintiffs throughout this litigation.

9. Class Representatives, in whole or in part, have been attentive throughout this litigation and have vigorously supported us at every step of this litigation. Class Counsel is experienced in class action cases, which is displayed in the various declarations that, in addition to this Declaration, are from at least one member of each firm comprising Class Counsel. The Class Representatives frequently communicated with Class Counsel and willingly gave of their time. The Class Representatives were not promised anything for their participation as representatives for the Class.

10. Given the Class Representatives' commitment to representing the Class in this case, Class Counsel believes that the Class Representative Service Awards of \$17,000.00 (\$5,000.00 to Ethan Ryder as the lead plaintiff who attended the first all-day mediation session in person; \$2,000.00 each to James Chambers, Maureen Mann, Viola Thomas, Kimberly Duncan, Jose Aguliar, and Elizabeth Manley) are reasonable under the circumstances of this case.

**CLASS COUNSEL AND THE CLASS REPRESENTATIVES' STRONGLY
SUPPORT THE SETTLEMENT**

11. Comparing the high economic value to Class against the substantial risks of non-recovery, Class Counsel and the Class Representatives strongly support granting final approval of the Settlement.

THE CLASS NOTICE & SETTLEMENT ADMINISTRATION

12. Class Counsel worked with JND and Wells Fargo to craft a notice plan that would reach as many Class Members as possible. Wells Fargo provided the names of each Class Member and mailing address of record to JND for the purpose of issuing notice via regular U.S. Mail. On October 15, 2021, JND issued the class notice to Class Members via Regular U.S. Mail. JND then attempted to locate updated addresses for any Class Members' notices that were returned as undeliverable and then remailed those notices where updated addresses were identified. Class Counsel believes the notice program in this Settlement was fair and reasonable.

13. JND's expenses during and through settlement administration will be submitted for the Court's review.

CLASS COUNSEL'S LODESTAR AND EXPENSES

14. Class Counsel prosecuted this case entirely on a contingent fee basis with no promise of payment for their attorneys' fees expended in this matter and the understanding that they may not recover any of their litigation expenses. Class Counsel took steps to minimize expenses where possible while continuing to prosecute the case to the best of their ability. My firm has expended 801.75 hours totaling \$422,278.92 in lodestar prosecuting Wells Fargo's failure to provide trial loan modifications to Class Members. These totals are based on my firm's historical hourly rates and supported within this market. In total, based on the lodestar totals my co-counsel firms have reported to me, Class Counsel expended 2,007.25 hours for a total lodestar of \$1,156,209.42 prosecuting Wells Fargo's failure to provide trial loan modifications to Class Members. Class Counsel's lodestar of \$1,156,209.42 carries a 2.35 multiplier to reach the \$2,719,093.00 of attorneys' fees Wells Fargo agreed to pay in this matter. A 2.35 multiplier is a

modest multiplier considering the substantial monetary payments Class Members will receive under the Settlement.

15. From experience, I anticipate that Class Counsel will expend substantial time and effort continuing to represent the Class's best interests in this matter throughout settlement administration, including answering Class Members questions, encouraging and following up with Class Members to timely cash their settlement payments, and working with JND to efficiently administer the Settlement. I anticipate Class Counsel will expend an additional \$300,000.00 in future lodestar representing the Class through settlement administration. Factoring in this \$300,000.00 of lodestar, the multiplier will be reduced to 1.87– again indicating that the multiplier is reasonable if using a lodestar crosscheck to measure the reasonableness of the fee request.

16. My firm has incurred \$19,467.13 in litigation expenses for the direct benefit of the Class. Class Counsel's expenses total \$43,726.97 (\$19,467.13 for my firm; \$6,994.67 for Markovits, Stock & DeMarco, LLC; \$6,064.00 for Gibbs Law Group; \$4,651.19 for Keller Rohrback; and \$6,549.72 for Paul LLP), which is below the \$65,000.00 cap Wells Fargo agreed to pay for Class Counsel's expenses. Class Counsel have reviewed in detail their expenses to ensure they are appropriately attributable to this matter.

ALLOCATION OF SETTLEMENT FUNDS

17. The following table describes each category and the payments members of that category would receive under the Allocation Plan.

| Category | Description | Allocation |
|-----------------|--|--|
| Short Sale | Class Member sold his or her property in a short sale. | \$19,000 per loan for Short Sale Class Member, in addition to any sums already received separately from Wells Fargo. |

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| Service Transfer: Service Transfer—Foreclosed and Service Transfer—Not Foreclosed | Service and management of the Class Member's mortgage and loan were transferred from Wells Fargo to another entity. Some of these Class Members were subsequently foreclosed upon, but are not members of the <i>Hernandez</i> Class because their homes were not foreclosed by Wells Fargo. | Service Transfer—Foreclosed: \$13,000 per loan for Service Transfer Class Member whose home was subsequently foreclosed upon, though not by Wells Fargo, in addition to any sums already received separately from Wells Fargo. Service Transfer—Not Foreclosed: For Service Transfer Class Members whose properties were not foreclosed upon, the Allocation Plan provides a \$5,000 payment per loan in addition to any sums already received separately from Wells Fargo. |
| Paid in Full | Class Members who have paid off their mortgage. | \$5,000 per loan for Paid in Full Class Members, in addition to any sums already received separately from Wells Fargo. |
| Active | Class Members who are still actively paying on their mortgages. | \$4,000 per loan for Active Class Members, in addition to any sums already received separately from Wells Fargo. |
| Sub-Modification | Class Members who were initially denied a trial modification due to Wells Fargo's error, but whose error was subsequently fixed and were provided a modification. | \$1,000 per loan for Sub-Modification Class Members, in addition to any sums already received separately from Wells Fargo. |

This Declaration is true and accurate to the best of my personal knowledge.

Executed on January 11, 2022 in Cleveland, Ohio.

/s/ Marc E. Dann

EXHIBIT A

DannLaw

Since 2008, DannLaw has represented individuals and businesses in a wide array of legal matters. The attorneys of DannLaw are established and respected trial lawyers who represent clients in simple litigation, complex litigation, appellate litigation, and class action lawsuits. DannLaw has recovered millions of dollars on behalf of thousands of individuals and businesses across the country including the states of Ohio, Illinois, Oregon, Florida, Kentucky, New Jersey and Tennessee.

Marc E. Dann

Marc Dann is the Managing Partner of DannLaw. He is also a Partner of Advocate Attorneys LLP in Washington DC. These practices focus on representing clients who have been harmed by banks, debt buyers, debt collectors and other financial predators and providing access legal services for traditionally underserved working class and middle class Americans. Dann has fought for the rights of tens of thousands of consumers and brought class actions lawsuits on behalf of clients in both private practice and as Ohio's Attorney General.

As Ohio Attorney General, Marc Dann initiated securities fraud claims against the creators of mortgage- backed securities on behalf of Ohio's public pension funds. He assembled Ohio's Organized Crime Commission to mobilize Mortgage Fraud Task Forces in Ohio's major cities to prosecute those engaged in mortgage fraud and predatory lending, Dann's office challenged the standing of mortgage servicers to foreclose in cases where the State of Ohio was a party. Dann also worked with former Ohio Supreme Court Chief Justice Thomas Moyer to organize over 1,200 volunteer lawyers to represent homeowners in foreclosure.

After leaving the Attorney General's Office, Marc Dann began representing Ohio homeowners facing foreclosure pro bono. During this time, he recognized that the issues faced by individual homeowners represented patterns of practice throughout the mortgage servicing industry. In response, he mobilized a team and created DannLaw in order to fight for the rights of Ohioans.

Since DannLaw was founded, it has grown to represent clients facing a range of consumers' rights issues including in class action. While mortgage servicing litigation practice the foundation of DannLaw, Marc Dann has developed a comprehensive collection of tools designed to help clients stay in their homes including prosecuting more than 25 Class Action cases. . He is a recognized national leader in the use of federal mortgage servicing regulations to hold servicers accountable for their actions.

Utilizing these tools has led Marc Dann to host seminars explaining these techniques to other attorneys. These working groups help to elevate the defense of clients across the nation while

allowing attorneys to recognize patterns of practice that affect all citizens.

This collaborative spirit also applies to the communities of which DannLaw is a part. Marc Dann serves on the Lakewood Ohio Tree Advisory Committee. Marc Dann and DannLaw also support the Cleveland International Film Festival each year.

Dann prioritizes professional organizations as well as being a member of the American Bar Association, the Federal Bar Association, the Cleveland Metropolitan Bar Association, the National Association of Consumer Advocates and the National Association of Consumer Bankruptcy Attorneys. He is a member of the Society of Attorneys General Emeritus and the Democratic Attorneys General Association.

Marc Dann is a regular contributor to *Attorney at Law Magazine* and the *Cleveland Metropolitan Bar Association Magazine*. His work has also been featured in *NACBA's Consumer Bankruptcy Journal* and *Legal Ink Magazine* and *Working Class Perspectives* compiled by Georgetown University.

Dann has been appointed as lead counsel in *Lieber, et al. v. Wells Fargo Bank, N.A.*, NDOH Case No. 1:16-cv-02868 and *Miller, et al. v. Intelelos, Inc.*, NDOH Case No. 1:17-cv-00763 as well as co-lead counsel in *George Koustis, et al. v. Select Portfolio Servicing*, NDOH Case No. 1:20-cv-02425. Dann is currently acting as lead counsel in two additional matters: *Madyda v. Ohio Department of Public Safety*, Ohio Court of Claims Case No. 2019-00426JD and *Miles Black, et al. v. City of Girard, Ohio, et al.*, Trumbull County Court of Common Pleas Case No. 2018 CV 1256. Dann has been appointed as Interim Lead Counsel in *Acker, et al. v. ProTech Solutions Inc.*, ED Ark. 4:20-cv-00852. In addition to the lead counsel appointments, Dann has been appointed as Liaison Counsel in *In re: Sonic Corp. Customer Data Security Breach*, NDOH 17-md-2807. Dann presently serves as Liaison Counsel for the Guardians of NAS Children in *In re: National Prescription Opiate Litigation*, NDOH 17-md-02804.

Dann is admitted to practice in the United States Court of Appeals for the Sixth Circuit, the United States Court of Appeals for the Ninth Circuit, United States District Court for the Southern District of Ohio, United States District Court for the Northern District of Ohio, United States District Court for the Northern District of Illinois, The Northern District of Indiana, The Western District of Tennessee and the Ohio Supreme Court. He has pro hac vice admission in Cook County, Illinois, Washoe County Nevada, United States District Court for the Southern District of Florida, United States District Court for the Middle District of Florida, United States District Court for the Northern District of Georgia, United States District Court in Nevada, United States District Court for the Western District of New York, United States District Court for the Southern District of New York, United States District Court for the Eastern District of

New York, United States District Court for the District of New Jersey, United States District Court for the Eastern District of Pennsylvania, United States District Court for the Western District of Washington, the United States District Court for the Western District of North Carolina, and the United States District Court for the Central District of California

A native of Cleveland, Ohio, Marc Dann is a 1984 graduate of the University of Michigan, where he earned a bachelor's degree in history. He graduated from the Case Western Reserve University School of Law in 1987.

Andrew Wolf (Of Counsel)

Since opening his law practice in September 1997, Andrew Wolf, who joined DannLaw in October 2021, has become one of the most prominent, prolific, and respected consumer protection attorneys and Class Action in the United States.

Along with resolving hundreds of cases on behalf on individuals, Mr. Wolf has been certified as Class Counsel in 138 action case involving New Jersey's Consumer Fraud and Truth-in-Consumer Contract Warranty and Notice Acts, the federal Fair Debt Collection Practices Act, and other statutes. In addition to aggressively and successfully representing his clients, Andrew has generously shared his knowledge, expertise, and experience with the legal community. He taught consumer protection law to New Jersey's legal services attorneys in 2002, 2003, and from 2007 to 2013, was a featured panelist at the 2003 New Jersey State Bar Convention, the 2004 Consumer Law Day, and the 2005 New Jersey Judicial College. He has provided continuing legal instruction in the areas of consumer and class action law, served as a panelist on programs conducted by Rutgers Law School's Eric R. Neisser Public Interest Program, and was an adjunct professor at his alma mater, Rutgers University School of Law at Newark from 2013-2016 and 2018-2019.

Mr. Wolf has earned numerous honors and awards for his work on behalf of consumers. He has been designated as a SuperLawyer annually since 2014, received the Debevoise-Eakeley Award from New Jersey Legal Services in 2010 in recognition of his unparalleled support for the organization, and was the recipient of the 2018 Robert J. Cirafesi Chancery Practice Award from the Middlesex County Bar Association.

Mr. Wolf earned a bachelor's degree at Queens College (CUNY) in 1980, a Masters in Business Administration from St. John's University in 1987, and his Juris Doctorate at Rutgers University School of Law in 1995. He was admitted to practice in the state of New Jersey in 1995, the Federal District Court of New Jersey in 1996, the Third Circuit Court of Appeals in 1999, and the United States Supreme Court in 2010.

He is a member of the National Association of Consumer Advocates (NACA), a Board Member of the Consumers League of New Jersey, the New Jersey State Bar Association, the Middlesex County Bar Association, and was appointed by the New Jersey Supreme Court to serve on the Special Civil Part Practice Committee for five terms.

He is also heavily involved in alternative dispute resolution as both a mediator and arbitrator. He is approved as a Mediator by the State of New Jersey, Department of Law and Public Safety, the State of New Jersey Judiciary, and as a Trainer in Mediation and Conciliation Skills for New Jersey's Administrative Office of the Courts.

Brian D. Flick

Mr. Flick advocates for plaintiffs and defendants nationwide in state and federal trial and appellate courts. His practice areas include Consumer Bankruptcy debtor representation in the areas of Chapter 7, 12, and 13, consumer fraud, real estate litigation, foreclosure defense, student loan debt defense, Bankruptcy Litigation, and Mortgage Servicing Litigation under the Real Estate Settlement Procedures Act and the Truth in Lending Act.

He has experience in all phases of litigation including extensive discovery, substantive motion practice, trial practice, and appellate practice. Mr. Flick has worked vigorously for over 14 years to protect the rights of consumers and to pursue recovery for plaintiffs and defendants in numerous civil matters including class actions.

Mr. Flick graduated from Adrian College with a B.A. In Political Science. He earned his law degree from the Ohio Northern University Pettit College of Law. While in law school, he received several academic awards and appeared on the Dean's List multiple times.

Since beginning the practice of law, he has been very active in local and national attorney associations. He is active with the Cincinnati Bar Association's Bankruptcy Committee. Brian also sits on the Volunteer Lawyers Committee for the Cincinnati Bar Association. He is the current Sixth Circuit Listserv Moderator for the National Association of Consumer Bankruptcy Attorneys, a position he has held since May 2017. He is the current Ohio State Chair for the National Association of Consumer Advocates, a position he has held since May 2017. He was also appointed by the Board of Trustees as a member of the Unauthorized Practice of Law Committee of the Cincinnati Bar Association, a position he has held since June 2017. Mr. Flick has been a frequent speaker at Cincinnati Bar Association, NACBA, and NACA events since 2014 as well as assisting with DannLaw's Regulation X and Z Seminars that have taken place since 2016.

Mr. Flick has worked as associate counsel in many class actions the firm has handled including *Lieber, et al. v. Wells Fargo Bank, N.A.*, NDOH Case No. 1:16-cv-02868, *Madyda v. Ohio Department of Public Safety*, Ohio Court of Claims Case No. 2019-00426JD and *Miles Black, et al. v. City of Girard, Ohio, et al.*, Trumbull County Court of Common Pleas Case No. 2018 CV 1256. Mr. Flick was appointed to the Interim Executive Committee in *Angus, et al. v. Flagstar Bank, FSB*, EDM Case No. 2:21-cv-1067.

Mr. Flick is admitted to the practice of law in the State of Ohio, State of Kentucky and the Federal District Courts and Bankruptcy Courts in the following jurisdictions: Southern District of Ohio; Northern District of Ohio; District of Colorado; Northern District of Illinois; Northern District of Indiana; Southern District of Indiana; Eastern District of Kentucky; Western District of Kentucky; Eastern District of Tennessee; Western District of Tennessee; Eastern District of Michigan and the Western District of Michigan. He has also been admitted *pro hac vice* in civil litigation in the following United States District Courts for either resolved or pending matters: District of Oregon, District of Nevada, Western District of North Carolina, Southern District of New York, Eastern District of Pennsylvania, Central District of California, Middle District of Florida and Southern District of Florida. He is also admitted in the United States Court of Appeals for the Sixth Circuit.

Michael A. Smith, Jr.

Mr. Smith is the most recent addition to DannLaw's team of highly skilled attorneys. A graduate of the Ohio State University and the University of Georgia School of Law Mr. Smith is admitted to practice in the State of Ohio, State of New Jersey, the United States District Court for the Northern District of Ohio and the United States District Court for the District of New Jersey. Smith has been active in federal litigation, including Class Action Litigation in the state and Federal Courts of Ohio and New Jersey.

Emily White

After spending nearly a decade as a public interest attorney, Emily White joined DannLaw. She is the Managing Partner of the firm's Columbus, Ohio office where she practices student loan debt, disability rights, Class Action and consumer law.

Emily received her law degree from the City University of New York School of Law, where she served on the editorial board of the New York City Law Review. Following law school, she served for two years as a judicial law clerk to the Honorable Sylvia H. Rambo, U.S. District Court Judge for the Middle District of Pennsylvania.

In 2009 she joined the Legal Aid Society of Cleveland, where she represented low-income consumers during the historic recession and foreclosure crisis. While at Legal Aid she authored a chapter of Ohio Consumer Law focused on student loans and helped student loan borrowers resolve defaults and apply for student loan discharges.

In 2013 she joined Disability Rights Ohio as a staff attorney. In that role Emily represented individuals with disabilities in employment and higher education matters and offered advice about issues related to student loans and vocational rehabilitation services.

Emily received an undergraduate degree in Philosophy from the University of Illinois at Urbana-Champaign. Before attending law school she served as an AmeriCorps volunteer with Habitat for Humanity NYC.

Javier Merino

Attorney Javier Merino is the managing partner of the New Jersey office of DannLaw where he focuses his practice on Consumer, Bankruptcy and Mortgage Servicing Litigation. after receiving his Juris Doctorate from St. John's University School of Law. His practice is focused on bankruptcy, foreclosure defense, and negotiating mortgage loan modifications.

Marino has litigated dozens of claims under Federal and State Consumer Law laws in New Jersey and New York and has defended hundreds of Foreclosure cases.

While at St. John's Law School he was the Executive Blog Editor for the New York Litigator Law Journal and served as treasurer of the Metropolitan/Latino Law Student Association. He also volunteered his time assisting in the preparation of bankruptcy petitions while working at the St. John's Bankruptcy Advocacy Clinic.

Javier Merino is a graduate of Rutgers University and St. John's Law School

Attorney Merino is licensed to practice in the states of New Jersey and New York, the Federal District Court of New Jersey, Third Circuit Court of Appeals, Eastern District of New York, and the Southern District of New York.

Dan Solar

Attorney Dan Solar has brought consumer cases against loan modification mills and financial institutions, won motions to vacate older foreclosure judgments on behalf of DannLaw clients,

and unearthed significant evidence of fraud and robo-signing via the legal discovery process.

A licensed attorney since 2009, Dan earned a B.A. in Political Science from Denison University in 2006 and a J.D. from the University of Akron School of Law in 2009. He served an internship at the Cuyahoga County Public Defender's Office and during his years in law school worked as a law clerk for a firm in Akron, Ohio where he focused on a variety of tort matters and insurance litigation.

In addition to his extensive legal training, Attorney Solar's experience in the origination of mortgage loans gives him a specialized, in-depth and invaluable knowledge of every facet of the mortgage lending process.

Attorney Solar is admitted to practice in the State of Ohio, the United States District Courts for the Northern and Southern Districts of Ohio, and the Eleventh Circuit Court of Appeals.

REPRESENTATIVE CLASS ACTIONS CASES

Completed Cases:

Koustis, et al. v. Select Portfolio Servicing, Inc., 1:20-cv-02425-DAP NDOH (Final Approval Order and Judgment entered 12/08/2021) - \$184,000.00 recovery for a nationwide class of borrowers whose lender failed to properly respond to qualified written requests, requests for information, and/or notices of error because of an improper active litigation, active mediation, or active bankruptcy exception.

In re Sonic Corp. Customer Data Security Breach, 1:17-md-2807 NDOH (Order granting Plaintiffs' Unanimous and Unopposed Motion to Appoint Attorney William B. Federman as Interim Lead Counsel, Attorney Marc Dann as Interim Liaison Counsel, and Attorneys Thomas A. Zimmerman, Jr., Michael R. Fuller, Melissa R. Emert and Miles Clark as Plaintiffs' Steering Committee signed 01/03/2018) - Class action for a nationwide class of individuals who had their personal and financial data stolen due to insufficient protection of that information by a retailer.

Miller et al. v. Inteleos, Inc., Case No. 1:17-cv-00763-DAP NDOH - \$570,000 recovery for a nationwide class of sonographers who took and passed a certification examination but the testing agency improperly scored their results and falsely reported that they failed the examination.

Lieber v. Wells Fargo Bank, N.A., Case No. 1:16-cv-02868-PAG NDOH - \$425,000 recovery for a nationwide class of borrowers whose lender failed to properly respond to qualified written requests, requests for information, and/or notices of error because of an improper active litigation, active mediation, or active bankruptcy exception.

Clark, et al. v. Lender Processing Services, Inc, et al., Case No. 2:12-cv-02187 NDOH

Hlavasa, et al. v. Bank of America, et al., Case No. 2:2011-cv-00530 NDOH

Turner, et al. v. Lerner, Sampson & Rothfuss, Case No. 1:11-cv-00056 NDOH

Andrew R. Wolf, of Counsel to DannLaw has been certified as class counsel individually in the following cases as of January 2022:

1. Mathis v. Hillside Auto Mall, Inc., et al.
Docket No. UNN-L-5674-01 (Superior Court of New Jersey, Union County)
2. United Consumer Financial Services Co. v. Carbo
Docket No. HUD-L-3438-02 (Superior Court of New Jersey, Hudson County)
3. Wilson v. Burt, et al.
Docket No. MER-L-1947-03 (Superior Court of New Jersey, Mercer County)
4. Wilson v. AutoNation, et al.
Docket No. MID- L-1319-04 (Superior Court of New Jersey, Middlesex County)
5. Galatis v. Psak, Graziano, Piasecki & Whitelaw, et al.
Docket No. MID-L-5900-04 (Superior Court of New Jersey, Middlesex County)
6. Moreno v. Lawrence Lincoln-Mercury, Inc.
Docket No. MID-L-2869-02 (Superior Court of New Jersey, Middlesex County)
7. Muller-Moreno, et. al. v. Malouf, et. al.
Docket No. MID-L-4464-02 (Superior Court of New Jersey, Middlesex County)
8. Romano and Smerling v. Dayton Auto Center, et al.
Docket No. MID-L-5176-02 (Superior Court of New Jersey, Middlesex County)
9. Losgar v. Freehold Chevrolet, Inc.
Docket No. MON-L-3145-02 (Superior Court of New Jersey, Monmouth County)
10. Davis v. Liccardi, et al.
Docket No. UNN-L-001546-03 (Superior Court of New Jersey, Union County)
11. Wenger, John v. East Brunswick Buick Pontiac GMC etc.
Docket No. MID-L-5617-03 (Superior Court of New Jersey, Middlesex County)
12. Arteaga v. Moda Furniture, et al.
Docket No. MRS-L000980-05 (Superior Court of New Jersey, Morris County)
13. Barrood v. IBM
Docket No. MER-L-0843-98 (Superior Court of New Jersey, Mercer County)

14. Robilotti v. Garden Irrigation et al.
Docket No. MON-L-002147-03 (Superior Court of New Jersey, Monmouth County)
15. Valley National Bank v. Jeffery Cahn
Docket No. MER-L-0504-04 (Superior Court of New Jersey, Mercer County)
16. Grandberry and Deloatch v. Pressler & Pressler
Docket No. MID-L-001356-06 (Superior Court of New Jersey, Middlesex County)
17. Hudson United Bank v. Wendy D. Chase
Docket No. HNT-L-37-04 (Superior Court of New Jersey, Hunterdon County)
18. DeBenedetto vs. Del Monte Corporation, et al.
Docket No. MID-L-003163-06 (Superior Court of New Jersey, Middlesex County)
19. Nthenge, et al. v. Pessler and Pressler, et al.
Docket No. MID-L-001363-06 (Superior Court of New Jersey, Middlesex County)
20. Estep v. Smythe Volvo, Inc., et al.
Docket No. UNN- L-004184-03 (Superior Court of New Jersey, Union County)
21. Miller, Jennifer, et al v. CVS Corporation
Docket No. MID-L-003855-06 (Superior Court of New Jersey, Middlesex County)
22. Fisher, Samuel v. Walgreen Co. et al.
Docket No. MID-L-004090-06 (Superior Court of New Jersey, Middlesex County)
23. Picket v. Triad, et al.
Docket No. MID- L-007727-05 (Superior Court of New Jersey, Middlesex County)
24. Clemons & Jordan vs. Donna Thompson, Esq.
Docket No. MON-L-001980-07 (Superior Court of New Jersey, Monmouth County)
25. Fisher v. Hallmark Marketing Corporation et al.
Docket No. MID-L-6465-06 (Superior Court of New Jersey, Middlesex County)
26. Wells v. DTD Enterprises, Inc.
Docket No. MID-L-9012-07 (Superior Court of New Jersey, Middlesex County)
27. Bessie Brown v. Hayt, Hayt & Landau, LLC
Docket No. ESX-L-7042-07 (Superior Court of New Jersey, Essex County)
28. Miller v. Weltman, Weinberg & Reis, Co., L.P.A.
Docket No. MID-L-6248-07 (Superior Court of New Jersey, Middlesex County)

29. Santos & Velez v. Samuel Silver, Esq. et al
Docket No. MID-L-08188-07 (Superior Court of New Jersey, Middlesex County)
30. Cruz, Romeo R. v. Condor Capital Corp.
Docket No. MID-L-2108-06 (Superior Court of New Jersey, Middlesex County)
31. Walker, Michael v. Hill Wallack LLP
Docket No. MID-L-003480-08 (Superior Court of New Jersey, Middlesex County)
32. Portfolio Recovery Associates, LLC v. Patricia M. Barnes, et al
Docket No. MID-L-009791-06 (Superior Court of New Jersey, Middlesex County)
33. Debra Smerling & Sheila Smerling v. Harrah's Entertainment Inc.
Docket No. MID-L-008733-04 (Superior Court of New Jersey, Middlesex County)
34. Moore, William v. NCO Financial Systems Inc. consolidated with
Meekins, Elizabeth v. NCO Financial Systems Inc.
Case # 2:08-CV-01936-JAG-MCA (Federal District Court of New Jersey)
35. Wenger, Christopher & Jennifer. vs. Cardo Windows, Inc. et al
Docket No.: MID-L-4924-07 (Superior Court of New Jersey, Middlesex County)
36. The Provident Bank v. Patricia Deprospeo
Docket No.: UNN-L-1393-09 (Superior Court of New Jersey, Union County)
37. Parkin, Nicole v. Bank of America, N.A.
Docket No. MID-L-8170-07 (Superior Court of New Jersey, Middlesex County)
38. Mohrle, Dawn v. Timco, Inc. d/b/a Planet Honda
Docket No. UNN-L- 000953-08 (Superior Court of New Jersey, Union County)
39. Quinonnes-Malone, Carmen v. Pellegrino & Feldstein, L.L.C., et al
Case # 2:08-cv-03295-JAG-MCA (Federal District Court of New Jersey)
40. Kho, Ernesto vs. Nationwide Home Relief, LLC
Docket No. MID-L-4245-09(Superior Court of New Jersey, Middlesex County)
41. Peabody, Gail v. Legal Loan Modifications, Inc., et al
Docket No. MID-L-6981-09 (Superior Court of New Jersey, Middlesex County)
42. Coleman, Lori and Henry, Jahod v. Edison Auto Sales, Inc. et al
Docket No. MID-L-8168-09 (Superior Court of New Jersey, Middlesex County)

43. Wenger, Christopher vs. Freehold Subaru, LLC et al.
Docket No. MON-L-4003-10 (Superior Court of New Jersey, Monmouth County)
44. Richardson vs. Allied Interstate, Inc., et al.
Case No. 09-2265-MLC-DEA (Federal District Court of New Jersey)
45. Kim Robinson and Jacob Robinson v. Donna L. Thompson
Case No. 3:10-cv-04143-JAP-TJB (Federal District Court of New Jersey)
46. Mark Epstein & Mira Epstein v. Sears Roebuck & Co., Inc.
Docket No. UNN-L-1732-09 (Superior Court of New Jersey, Union County)
47. Elaine Drake v. Wells Fargo Bank, N.A.
Docket No. MID-L-4177-09 (Superior Court of New Jersey, Middlesex County)
48. Dipopolo & Kawajian v. Ramsey Nissan, Inc.
Docket No. BER-L-10319-09 (Superior Court of New Jersey, Bergen County)
49. John Tortora v. Guardian Protective Services, et al.
Docket No. MID-L-1041-10 (Superior Court of New Jersey, Middlesex County)
50. Te, Montesclaro, & Te v. Thrift Investment Corporation, et al.
Docket No. MID-L-2061-10 (Superior Court of New Jersey, Middlesex County)
51. Berger, Garrett and Kelter, Bonny vs. PCUSA Corporation
Docket No. MID-L-3211-11 (Superior Court of New Jersey, Middlesex County)
52. Pollitt vs. DRS Towing, LLC
Case No. 3:10-cv-01285 (Federal District Court of New Jersey)
53. Sheikh/Sheikh vs. Maxon Hyundai, et al
Docket No. UNN- L-000476-09 (Superior Court of New Jersey, Union County)
54. Bosland, Rhonda v. Warnock Dodge, Inc. et al
Docket No. MRS- L-844-06 (Superior Court of New Jersey, Morris County)
55. Martell, Rhonda v. Warnock Dodge, Inc. et al
Docket No. MRS- L-1085-09 (Superior Court of New Jersey, Morris County)
56. Alper, Todd v. Warnock Motor Sales, Inc. d/b/a/ Warnock Ford, et al
Docket No. MRS- L-1640-10 (Superior Court of New Jersey, Morris County)
57. Richard R. Froumy and Victoria M. Carr v. Stark & Stark, et al
Case No. 3:09-CV-4890-LHG (Federal District Court of New Jersey)

58. Pollitt v. Wachovia Dealer Services, Inc., et al
Case No. 3:10-cv-01285-DEA (Federal District Court of New Jersey)
59. Chulsky v. Hudson Law Offices, P.C., et al
Case No. 3:10-CV-03058-LHG (Federal District Court of New Jersey)
60. Williams v. The CBE Group, et al
Case No. 2:11-cv-3680-PS (Federal District Court of New Jersey)
61. Petersen, Daniel vs. Central Jersey Pool & Supply Co., Inc., et al.
Docket No. MON-L-4044-11 (Superior Court of New Jersey, Monmouth County)
62. Eisenberger, Ruth vs. Boston Service Co., Inc. d/b/a Hann Financial Svc. Corp.
Docket No. MID-L-10366-09 (Superior Court of New Jersey, Middlesex County)
63. Lileikyte, Asta vs. Bergen Auto Eenterprises, LLC d/b/a Wayne Mazda
Docket No. MID-L-6222-10 (Superior Court of New Jersey, Middlesex County)
64. Lippert, Tammy vs. Edison Motor Cars, Inc. d/b/a Brad Benson Mitsubishi/Hyundai
Docket No. MID-L-6599-10 (Superior Court of New Jersey, Middlesex County)
65. Diop, Aissatou vs. I.C. Systems, Inc.
Docket No. MID-L-1062-11 (Superior Court of New Jersey, Middlesex County)
66. Bush, Tanya vs. Renovo Services, LLC, et als.
Docket No. MID-L-5132-10 (Superior Court of New Jersey, Middlesex County)
67. Avalishvili, Zhanetta vs. Reussille Law Firm, LLC, et al
Case No. 3:12-cv-02772-TJB (Federal District Court of New Jersey)
68. Martina, Sophia vs. LA Fitness International, LLC
Case No. 2:12-cv-02063-WHW (Federal District Court of New Jersey)
69. Korror, Margaret vs. Aaron's, Inc., et al.
Case No. 3:10-cv-6317-MAS (Federal District Court of New Jersey)
70. Hernandez, Rodolfo vs. Enhanced Recovery Company, LLC, et al.
Docket No. MID-L-2640-12 (Superior Court of New Jersey, Middlesex County)
71. Walker, Michael vs. Cutolo Law Firm, LLC, et al.
Docket No. MID-L-7498-11 (Superior Court of New Jersey, Middlesex County)
72. Mukoma, Stephen vs. Fleet Lease Network, Inc.

Docket No. HUD-L-2707-12 (Superior Court of New Jersey, Hudson County)

73. Wenger, Christopher D. vs. South Brunswick Furniture, Inc., etc., et al
Docket No. MID-L-000479-12 (Superior Court of New Jersey, Middlesex County)

74. Katz, et al. vs. Live Nation, Inc., et al.
Case No. 09-cv-03740-DEA (Federal District Court of New Jersey)

75. Blaine, Joanne vs. Pressler & Pressler, LLP
Docket No. MID-L-583-11 (Superior Court of New Jersey, Middlesex County)

76. Davis, Ollie vs. First Financial Federal Credit Union, et al.
Docket No. MON-L-4493-11 (Superior Court of New Jersey, Monmouth County)

77. Khweye, Uz C./Rivera, Pura vs. Leaders Financial Company, et al.
Docket No. ESX-L-5584-10 (Superior Court of New Jersey, Essex County)

78. Khweye, Uz C. vs. Mullooly, Jeffrey, Rooney & Flynn, LLP
Docket No. ESX-L-5585-10 (Superior Court of New Jersey, Essex County)

79. Gordon, Ella and Martha vs. Feinstein, Raiss, Kelin & Booker, LLC
Case No. 3:13-cv-00089-MAS (Federal District Court of New Jersey)

80. Robinson, Shaquanna vs. J & C Auto Outlet, LLC
Docket No. MID-L-1961-13 (Superior Court of New Jersey, Middlesex County)

81. Allen, Stacy vs. National Auto Outlet
Docket No. MID-L-004905-13 (Superior Court of New Jersey, Middlesex County)

82. Willis, Laura vs. Galleria Route One Corporation, et al.
Docket No. MID-L-001315-12 (Superior Court of New Jersey, Middlesex County)

83. Fonville, Shanique vs. Clover Commercial Corporation, et al.
Docket No. UNN-L-000563-13 (Superior Court of New Jersey, Union County)

84. Caruso, Jerry/Brady, Sandra v. WOW, et als.
Docket No. MID-L-3112-13 (Superior Court of New Jersey, Middlesex County)

85. Fonville, Shanique and Nekisha vs. Schwartz Barkin & Mitchell, et al.
Docket No. UNN-L-001097-13 (Superior Court of New Jersey, Union County)

86. Malangone, Dolores v. Izzy's Inc. etc., et al.
Docket No. OCN-L-515-13 (Superior Court of New Jersey, Ocean County)

87. Ortiz-Rodriguez, Norma vs. Pressler & Pressler, LLP

Docket No. MID-L-007253-13 (Superior Court of New Jersey, Middlesex County)

88. Norris, Michael/Tatem, Christopher vs. Bill Me Later, Inc. & Eichenbaum and Stylianou, LLC

Docket No. MID-L-002364-15 (Superior Court of New Jersey, Middlesex County)

89. Gambrell, Eugene & Doris and Patel, Falguni vs. Hess Corporation, Inc.

Docket No. MID-L-7761-12 (Superior Court of New Jersey, Middlesex County)

90. Lechtrecker, Joshua vs. Pressler & Pressler, LLP

Docket No. MID-L-001933-15 (Superior Court of New Jersey, Middlesex County)

91. The Estate of Theresa Torsiello by Vincent Torsiello Executor vs. McGovern Legal Services, LLC

Case No. 3:14-cv-03814-DEA (Federal District Court of New Jersey)

92. Tirado, Ricardo vs. Deluxe Auto Group, LLC, et al.

Docket No. HUD-L-1069-14 (Superior Court of New Jersey, Hudson County)

93. Bowman, Lethrop vs. Lyons, Doughty & Veldhuis, P.C.

Docket No. MID-L-4474-14 (Superior Court of New Jersey, Middlesex County)

94. Celario, Michael vs. Route 22 Nissan, Inc.

Docket No. MID-L-000260-14 (Superior Court of New Jersey, Middlesex County)

95. McKenzie, Yusef vs. New City Funding Corp.

Docket No. MID-L-1952-14 (Superior Court of New Jersey, Middlesex County)

96. Thorne, Kimberly vs. Live Nation, Entertainment Inc.

Case No. 3:09-cv-03740-DEA (Federal District Court of New Jersey)

97. Pabon/Alvarado vs. Metro Auto Exchange

Docket No. UNN-L-1426-14 (Superior Court of New Jersey, Union County)

98. Rufo, Melissa vs. Alpha Recovery Corp.

Case No. 2:15-cv-0865-SRC (Federal District Court of New Jersey)

99. Politi, Andrew v. Pressler & Pressler, LLP, etc.

Docket No. MID-L-7273-15 (Superior Court of New Jersey, Middlesex County)

100. Nunez, Angel and Eve vs. Donna L. Thompson, Esq.

Docket No. MID-L-00949-15 (Superior Court of New Jersey, Middlesex County)

101. Nepomuceno, Luzvimid vs. Midland Management, Inc.

Case No. 2:14-cv-5719-SDW-SCM (Federal District Court of New Jersey)

102. Stepien, Lisa vs. PNC Financial Services Group, Inc.
Docket No. MID-L-2837-13 (Superior Court of New Jersey, Middlesex County)
103. Politi, Alexa vs. Gil Vigneault, et al.
Case No. 3:15-cv-04425-DEA (Federal District Court of New Jersey)
104. Javan, John vs. LVNV Funding, LLC, et al.
Docket No. MID-L-001866-16 (Superior Court of New Jersey, Middlesex County)
105. Vizthum, Tracy vs. Maguire East Windsor, LLC d/b/a Windsor Nissan
Docket No. MID-L-284-15 (Superior Court of New Jersey, Middlesex County)
106. Qureshi v. OPS 9, LLC
Case No. 2:14-cv-01806 (Federal District Court of New Jersey)
107. Mohammed v. Faloni Association
Docket No. MID-L-7880-13 (Superior Court of New Jersey, Middlesex County)
108. Shumaker v. Vengroff
Docket No. MID-L-5367-15 (Superior Court of New Jersey, Middlesex County)
109. Gomes v. Extra Space Storage, Inc.
Case No. 2:13-cv-929-KSH (Federal District Court of New Jersey)
110. Sefarian v. Carmadella et al.
Docket No. MID-L-005333-15 (Superior Court of New Jersey, Middlesex County)
111. Chung v. Northland Group Inc
Case No. 2:15-cv-06246 (Federal District Court of New Jersey)
112. Chung v. AllianceOne Capital
Case No. 2:15-cv-02905 (Federal District Court of New Jersey)
113. Raff v. Safavieh Livingston LLC
Docket No. ESX-L-2017-15 (Superior Court of New Jersey, Essex County)
114. Guillen v. AAA Limo and Luxury Car Services of East Brunswick
Docket No. MID-L-002661-16 (Superior Court of New Jersey, Middlesex County)
115. Kendall v. Cubesmart L.P., et al.
Case No. 3:15-cv-06098 (Federal District Court of New Jersey)
116. Santiago v. Northland Group Inc.
Case No. 2:15-cv-03608-CLW (Federal District Court of New Jersey)

117. Giulanelli v. Fredco Landscaping LLC
Docket No. ESX-L-004202-16 (Superior Court of New Jersey, Essex County)
118. Seigelstein v. Shrewsbury Motor, Inc. et al.
Docket No. MON-L-4072-15 (Superior Court of New Jersey, Monmouth County)
119. Park v. United Collection Bureau, Inc.
Case No. 2:15-cv-01306 (Federal Court of New Jersey)
120. Watkins v. Pressler & Pressler, LLC
Case No. 2:16-cv-00119-MCA-LDW (Federal District Court of New Jersey)
121. Harris v. General Motors Financial Co. Inc.
Docket No. MID-L-3170-15 (Superior Court of New Jersey, Middlesex County)
122. Shirey v. Project One Autosports LLC
Docket No. ESX-L-006233-16 (Superior Court of New Jersey, Essex County)
123. Sparks v. Service Finance Co., LLC
Docket No. MID-L-2441-17 (Superior Court of New Jersey, Middlesex County)
124. Labidou v. Fleet Lease Network, Inc.
Docket No. HUD-L-5191-15 (Superior Court of New Jersey, Hudson County)
125. Best v. Twin, Inc.
Docket No. ESX-L-8062-16 (Superior Court of New Jersey, Essex County)
126. Patterson v. Volkswagen Credit
Docket No. MID-L-6498-16 (Superior Court of New Jersey, Middlesex County)
127. Bonilla v. Pike Run II LLC
Docket No. MID-L-3986-17 (Superior Court of New Jersey, Middlesex County)
128. Martins v. Signature Pre-Owned LLC et al.
Docket No. HUD-L-3596-17 (Superior Court of New Jersey, Hudson County)
129. Thomas v. Hudson Valley Federal Credit Union
Docket No. ESX-L-8205-18 (Superior Court of New Jersey, Essex County)
130. Gonzalez v. New Century Financial Services Inc.
Docket No. ESX-L-00765-17 (Superior Court of New Jersey, Essex County)
131. McMillin v. The Traf Group Inc.
Case No. 3:18-cv-01734-DEA (Federal District Court of New Jersey)

132. Santiago v. Apothaker Scian P.C. et al.
Case No. 2:16-cv-01432-CCC-SMC (Federal District Court of New Jersey)
133. Pierre-Charles v. Consumer Portfolio Services, Inc.
Case No. 3:17-cv-10025-DEA (Federal District Court of New Jersey)
134. Deltoro v. City Select Auto Sales, Inc.
Docket BUR-L-00709-19 (Superior Court of New Jersey, Burlington County)
135. Mills v. Camping World RV et al.
Case No. 3:18-cv-02283-MAS-TJB (Federal District Court of New Jersey)
136. Browne v. Capital One Bank USA et al.
Docket No MID-L-05583-15 (Superior Court of New Jersey, Middlesex County)
137. Wares v. Guaranteed Motor Towing Service Inc. et al.
Docket No. MID-L-002088-16 (Superior Court of New Jersey, Middlesex County)
138. Roach v. BM Motoring LLC
Docket No. MID-L-001333-13 (Superior Court of New Jersey, Middlesex County)
139. Davis v. Omnisure
Docket No. CAM-L-3742-15 (Superior Court of New Jersey, Camden County)

Pending Cases:

RESPA and Mortgage Servicing Class Action

- DannLaw is putative class co-counsel in *Ryder, et al. v. Wells Fargo Bank, N.A.*, United States District Court for the Southern District of Ohio Case No. 19-cv-00638.
- DannLaw is putative class co-counsel in *Trivison, et al. v. Federal National Mortgage Association*, United States District Court for the Northern District of Ohio Case No. 20-cv-00711.
- DannLaw is co-counseling a Class action for a nationwide class of borrowers who were denied the requisite loan modification options, as required by the Real Estate Settlement Procedures Act against a Mortgage Servicer. The matter has not yet proceeded to appointment of Class Counsel or Class Certification.

Constitutional Violations

- DannLaw is putative class co-counsel in *Tarrify Properties, LLC, et al. v. Cuyahoga*

County, Ohio, et al., United States District Court for the Northern District of Ohio Case No. 19-cv-02293.

Data Breach/Misuse of Consumer Information -

- DannLaw has been appointed on the Plaintiff's Executive Committee in *Angus, et al. v. Flagstar Bank, FSB*, United States District Court for the Eastern District of Michigan Case No. 21-cv-10657;
- DannLaw has been appointed as Interim Class Co-Counsel in *Acker, et al. v. ProTech Solutions Inc.*, United States District Court for the Eastern District of Arkansas Case No. 20-cv-00852;
- DannLaw is co-counseling a Class action for a nationwide class and a statewide class for Ohio Consumers who were subject to a data breach from a third-party data collection agency who contracted with one of the three major Credit Reporting Agencies. The matter has not yet proceeded to appointment of Class Counsel or Class Certification and remains pending in the United States District Court for the Central District of California;

Disability Rights

- DannLaw is co-counseling a Class Action Class action for a nationwide class of disabled individuals who were denied full, equal and independent access to the goods, services and facilities provided by a hotel. The matter has not yet proceeded to appointment of Class Counsel or Class Certification.

Shareholder Derivative Suit

- DannLaw is co-counseling as Local Counsel a Shareholder Derivative Complaint against a multi-state Managed Care facility. The matter has not proceeded to Class Certification.
- DannLaw is co-counseling as Local Counsel a Shareholder Derivative Complaint against Fifth Third Bank, N.A. in Hamilton County, Ohio Court of Common Pleas. The matter has not proceeded to class certification.

NOTE: This list of cases is a representative sample of some of the class action lawsuits. It is not an exhaustive list as it does not include matters that have settled confidentially prior to any Motion for Class Certification.

EXHIBIT B

DannLaw - Lodestar & Expenses

Ryder v. Wells Fargo Bank, N.A., No. 1:19-cv-638 (S.D. Ohio)
 (includes time for prosecution of related cases, *Duncan v. Wells Fargo Bank, N.A.*, No. 3:19-cv-00172 (D.NJ) and *Ligouri, Jr., et al. v. Wells Fargo Bank, N.A.*, No. 7:19-cv-10677)

LODESTAR

| <u>Individual</u> | <u>Hours</u> | <u>Hourly Rate (2021)</u> | <u>Lodestar</u> |
|--|---------------------|----------------------------------|------------------------|
| Marc E. Dann (Partner) | 287.72 | \$725.00 | \$208,784.42 |
| Javier L. Merino (Partner) | 88.9 | \$450.00 | \$40,005.00 |
| Brian D. Flick (Partner) | 214.65 | \$500.00 | \$107,325.00 |
| Rusty Payton (Partner) | 8.25 | \$725.00 | \$5,981.25 |
| Daniel M. Solar (Partner) | 32.95 | \$450.00 | \$14,827.50 |
| Emily White (Partner) | 1.6 | \$450.00 | \$720.00 |
| Michael Smith (Associate Attorney) | 53.8 | \$300.00 | \$16,140.00 |
| Chelsea Lynn (Paralegal) | 33.05 | \$250.00 | \$8,262.50 |
| Edward Juhn (Paralegal) | 34.3 | \$250.00 | \$8,575.00 |
| Karen Ortiz (Paralegal) | 0.8 | \$250.00 | \$200.00 |
| Kimberly White (Paralegal) | 8.9 | \$250.00 | \$2,225.00 |
| Molly Forkins (Paralegal) | 0.1 | \$250.00 | \$25.00 |
| Sarah Wilk (Paralegal) | 0.2 | \$200.00 \$175.00 | \$40.00 |
| Edwardo Sanchez (Administrative Assistant) | 46.8333 | \$200.00 | \$9,366.67 |

| | | | |
|---|----------------------|----------|----------------------------|
| Antonette Scharsu (Administrative Assistant) | 1.0 | \$200.00 | \$200.00 |
| Jack Seeley (Administrative Assistant) | 0.2 | \$125.00 | \$25.00 |
| Kaitlyn Capwill (Administrative Assistant) | 2.5 | \$125.00 | \$312.50 |
| | | | |
| <u>Total</u> | <u>801.75</u> | | <u>\$422,278.92</u> |
| | | | |

EXPENSES

| Westlaw/Pacer | Tech Fees | JAMS Mediation | Filing Fees | Postage/Service of Process | Meals/Travel | TOTALS |
|---------------|------------|----------------|-------------|----------------------------|--------------|-------------|
| \$20.60 | \$9,926.29 | \$6,236.89 | \$1,700.00 | \$370.91 | \$1,212.44 | \$19,467.13 |

EXHIBIT C

Class Counsel – Lodestar & Expenses*Ryder v. Wells Fargo, NA*, No. 1:19-CV-638 (S.D. Ohio)**LODESTAR & EXPENSES**

| <u>Firm</u> | <u>Hours</u> | <u>Lodestar</u> | <u>Total Expenses</u> | <u>JAMS Mediation</u> |
|------------------------------------|------------------------|------------------------------|------------------------------|------------------------------|
| DannLaw | 801.75 | \$422,278.92 | \$19,467.13 | \$6,236.89 |
| Gibbs Law Group | 164.9 | \$133,713.00 | \$6,064.26 | \$6,064.26 |
| Keller Rohrback | 352 | \$258,756.50 | \$4,651.19 | |
| Markovits, Stock & DeMarco, LLC | 284.3 | \$154,495.00 | \$6,994.67 | \$5,891.59 |
| Paul LLP | 404.3 | \$186,966.00 | \$6,549.72 | \$6,150.61 |
| | | | | |
| <u>Total</u> | <u>2,007.25</u> | <u>\$1,156,209.42</u> | <u>\$43,726.97</u> | <u>\$24,343.35</u> |
| | | | | |